

RMG 'Speak Up' Hotline

Internal Audit & Risk Management (IA&RM) High Level Process (draft)

Purpose

Further to the Speak Up briefing from Doug Evans sent by Jonathan Taylor 15/07/2010 to the Top 140 managers, this note aims to clarify the proposed IA&RM process for responding to disclosures raised via the Speak Up hotline.

Speak Up Hotline

Speak Up is a new RMG hotline, being launched on 2nd August 2010, to allow workers to raise concerns in a confidential or anonymous manner. The new line is managed by InTouch MCS Ltd, a third party supplier to RMG.

The Speak Up hotline is available for workers to raise a breach of RMG's regulatory or legal requirements. It is probable however that calls related to other concerns will be received by InTouch and forwarded to RMG. IA&RM, as the nominated gateway within RMG for all disclosures made via the Speak Up hotline, will forward details of disclosures to relevant business contact for attention and investigation as appropriate.

Process Overview

Employees

Employees can disclose concerns three ways – through a web-based application, interactive voicemail, or through speaking to a service representative.

InTouch

Details of disclosures will be transmitted daily by InTouch to IA&RM, with the disclosure detailing as much relevant information as callers are willing to provide. It is considered that a large proportion of the disclosures received will be anonymous.

IA&RM

IA&RM will appropriately categorise disclosures as Health & Safety / Environmental; Theft & Fraud; Discrimination, Bullying & Harassment; HR Other; and, Operational (including Licence or other regulatory compliance). IA&RM will then cases to the appropriate pre-agreed contact point within the relevant RMG business unit.

IA&RM will normally 'redact' any personal details (to ensure confidentiality). Where the personal details are considered central to the disclosure and investigation or action would not be possible without the details being provided, IA&RM will provide these to business unit contacts only after confirming that the caller is happy for their details to be communicated.

Business Units

Any investigations arising from the disclosure should be undertaken with due regard to the Public Interest Disclosure Act (PIDA) 1998 which provides specific protection for workers making certain types of disclosures.

Business unit contacts should, within 20 working days of the disclosure being forwarded by IA&RM, provide IA&RM with;

- Confirmation as to whether the disclosure triggered an investigation or review;
- Confirmation as to whether any investigation or review has been completed
- For completed cases, IA&RM require a brief summary of the investigation or review findings and any actions taken as a result. For cases where the investigation / review is still underway IA&RM require a brief update of progress and the date the investigation is expected to be completed.

For cases which have not been completed within the 20 working day timescale IA&RM require a further update at the point the case is concluded.

IA&RM will not provide details of the result of any investigation or review to InTouch for onward communication to the person making the disclosure, where the person who made the disclosure is not known to IA&RM. Additionally, communication of the result of any investigation or review to those whose identity is known will only be made with the agreement and involvement of the appropriate business unit contact.

Note: All communications relating to disclosures should be sent to IA&RM using the dedicated employee confidential disclosure email account - [[HYPERLINK](mailto:rmgspkakupdisclosures@GRO) "mailto:rmgspkakupdisclosures@GRO"]